RICHARDSON GARDNER & ALEXANDER

ATTORNEYS-AT-LAW

117 EAST WASHINGTON STREET
GLASGOW, KENTUCKY 42141-2696
writer's e-mail: wlg@rgba-law.com

BOBBY H. RICHARDSON WOODFORD L. GARDNER, JR. T. RICHARD ALEXANDER II

August 7, 2014

(270) 651-8884 (270) 651-2116 FAX (270) 651-3662

Mr. Jeff Derouen Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40601 RECEIVED
AUG 1 1 2014
PUBLIC SERVICE

COMMISSION

Re: Case No. 2014-00155

Dear Mr. Derouen:

Enclosed for filing is the original and ten (10) copies of the response to Commission Staff's Third Request for Information, regarding the Application of Farmers Rural Electric Cooperative Corporation for Approval of an Optional Residential Time-of-Day Tariff and Fifteen Industrial Tariffs Based on Three Wholesale Power Tariffs Available to Farmers RECC.

Thank you for your assistance.

Woodford L. Gardner, Jr. Attorney for Applicant

Enclosures

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

APPLICATION OF FARMERS RURAL ELECTRIC) Case No.
COOPERATIVE CORPORATION FOR APPROVAL) 2014-00155
OF AN OPTIONAL RESIDENTIAL TIME-OF-DAY)
TARIFF AND FIFTEEN INDUSTRIAL TARIFFS BASED)
ON THREE WHOLESALE POWER TARIFFS AVAILABLE)
TO FARMERS RECC)

CERTIFICATE

STATE OF KENTUCKY)
COUNTY OF BARREN)

William T. Prather, being duly sworn, states that he has supervised the preparation of the responses of Farmers Rural Electric Cooperative Corporation to the Public Service Commission Staff's Third Information Request in the above-referenced case, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

Subscribed and sworn before me on this 80 day of August, 2014.

Notary Public

ID: 466934

Expires: 6/18/16

() illiam I. Pratters

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

APPLICATION OF FARMERS RURAL ELECTRIC) Case No.
COOPERATIVE CORPORATION FOR APPROVAL) 2014-00155
OF AN OPTIONAL RESIDENTIAL TIME-OF-DAY)
TARIFF AND FIFTEEN INDUSTRIAL TARIFFS BASED)
ON THREE WHOLESALE POWER TARIFFS AVAILABLE)
TO FARMERS RECC)

CERTIFICATE

STATE OF KENTUCKY)
COUNTY OF BARREN]

James R. Adkins, being duly sworn, states that he has supervised the preparation of the responses of Farmers Rural Electric Cooperative Corporation to the Public Service Commission Staff's Third Information Request in the above-referenced case, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

Subscribed and sworn before me on this $\frac{1}{2}$ day of August, 2014.

ID: 466934 Expires: 6/18/16

	-	
}		

Request 1:

Refer to Exhibit D of the application, Schedule 3, page 1 of 2. Explain why the proposed energy rates on this page do not reconcile to the energy rates shown in the proposed tariff pages filed in Exhibit B of the application, with the exceptions of LPC-1, LPB-1, and LPE-1. State which energy rates Farmers intends to propose and, if the energy rates included in the proposed tariffs are the rates being proposed, provide a revised Exhibit D, Schedule 3, pages 1 and 2, since the "Energy Adders" on page 2 would change.

Response 1:

These energy rates do not reconcile as the wrong schedule was used in Exhibit D, Schedule 3 of the original application. The proper rates are those listed in the filed tariffs. Attached as pages 2 and 3 of this response is the requested revised Exhibit D, Schedule 3.

Witness: James R. Adkins

Page 1 of 2

FARMERS RECC CASE NO. 2014-00155

APPLICATION FOR OPTIONAL TIME-OF-DAY TARIFF AND FIFTEEN INDUSTRIAL TARIFFS

FARMERS RECC PROPOSED MENU OF INDUSTRIAL RATES - DRAFT

	Den	nand	Π	Demand kW			Energ	y kWh	Customer
Rate Schedule	From	То	Co	ntract		xcess	On-Peak	Off-Peak	Charge
Large Power C-1	500 kW	999 kW	\$	7.17			\$ 0.057882		\$ 816.00
Large Power C-2	1,000 kW	2,999 kW	\$	7.17			\$ 0.055882		\$ 1,088
Large Power C-3	3,000 kW	4,999 kW	\$	7.17			\$ 0.054382		\$ 2,737
Large Power C-4	5,000 kW	9,999 kW	\$	7.17			\$ 0.051882		\$ 3,015
Large Power C-5	10,000 kW	& Over	\$	7.17			\$ 0.049382		\$ 4,301
Large Power B-1	500 kW	999 kW	\$	7.17	\$	9.98	\$ 0.057882		\$ 816.00
Large Power B-2	1,000 kW	2,999 kW	\$	7.17	\$	9.98	\$ 0.055882		\$ 1,088.00
Large Power B-3	3,000 kW	4,999 kW	\$	7.17	\$	9.98	\$ 0.054382		\$ 2,737.00
Large Power B-4	5,000 kW	9,999 kW	\$	7.17	\$	9.98	\$ 0.051882		\$ 3,014.50
Large Power B-5	10,000 kW	& Over	\$	7.17	\$	9.98	\$ 0.049382		\$ 4,301.00
Large Power E-1	500 kW	999 kW	\$	6.02			\$ 0.068279	\$ 0.059554	\$ 816.00
Large Power E-2	1,000 kW	2,999 kW	\$	6.02			\$ 0.066279	\$ 0.057554	\$ 1,088.00
Large Power E-3	3,000 kW	4,999 kW	\$	6.02			\$ 0.064779	\$ 0.056054	\$ 2,737.00
Large Power E-4	5,000 kW	9,999 kW	\$	6.02			\$ 0.062279	\$ 0.053554	\$ 3,014.50
Large Power E-5	10,000 kW	& Over	\$	6.02			\$ 0.059779	\$ 0.051054	\$ 4,301.00

Page 2 of 2

FARMERS RECC

East Kentucky Power Cooperative Wholesale Rates

Load Centers

LUAU CEITLE	<u>:13</u>			
	<u>Size - kVa</u>	<u>From</u>	<u>To</u>	<u>Rate</u>
		1,000	2,999	\$ 1,088
		3,000	7,499	\$ 2,737
		7,500	14,999	\$ 3,292
		15,000	& Over	\$ 5,310
Schedule C				
	Demand Per kV	V		\$ 7.17
	Energy per kWI	า	•	\$ 0.042882
Schedule B				
	Contract Dema	nd per kW		\$ 7.17
	Excess Demand	l per kW		\$ 9.98
	\$ 0.042882			
Schedule E				
	Demand Per kV	V	'	\$ 6.02
	On-peak Energy	y per kWh		\$ 0.053279
	Off-peak Energ	y per kWh		\$ 0.044554

Request 2:

Refer to Farmers' response to Item 9 of Commission Staff's Second Request for Information ("Staff's Second Request"), Exhibit A, page 1 of 1.

Request 2a:

Refer to the Proposed Base Rate table in the middle. Explain why the energy charge shown of \$.056882 per kWh does not reconcile with the proposed tariff for schedule LPC-3 of \$.054382 per kWh or with the LPC-3 energy charge in Exhibit D of \$.054882 per kWh. State which rate is correct for the comparison provided, or if a different rate is correct, provided a corrected table showing the bill comparison for the first industrial customer.

Response 2a:

Attached as pages two through four of this response are corrected calculations reflecting the use of energy rates of \$.054382 for LPC-3 which are consistent with the proposed tariff rate and the revised schedule provided in the response to item 1 of this data request.

Request 2b:

Refer to the Proposed Base Rate table on the right side of the page. Explain why the energy charge shown of \$.056882 per kWh does not reconcile with the proposed tariff rate for schedule LPB-3 of \$.054382 per kWh or with the LPB-3 energy charge in Exhibit D of \$.054882 per kWh. State which rate is correct for the comparison provided, or if a different rate is correct, provide a corrected table showing the bill comparison for the first industrial customer.

Response 2b:

Attached as pages two through four of this response are corrected calculations reflecting the use of energy rates of \$.054382 for LPB-3 which are consistent with the proposed tariff rate and the revised schedule provided in the response to item 1 of this data request.

Witness: James R. Adkins

FARMERS RECC CASE NO. 2014-00155

RESPONSE TO COMMISSIONS STAFF'S THIRD DATA REQUEST

Current Base Rates Member 1								
	Rates		Ref	tail	W	nolesale		
	Customer Cha	rge	\$	51.93				
	Demand Char	ge per kW	\$	7.12	\$	6.020000		
	Energy Charge	per kWh	\$	0.06513	\$	0.048917		
	<u>kW</u>	<u>kWh</u>		<u>kW \$\$</u>		Energy \$\$		<u>Total</u>
ın	3,110	1,611,184	\$	22,143		104,936	\$	127,132
ay	3,052	1,543,306	\$	21,730		100,516	\$	122,298
pr	2,914	1,468,409	\$	20,748		95,637	\$	116,437
ar	2,742	1,379,738	\$	19,522		89,862	\$	109,436
eb	2,734	1,309,622	\$	19,466		85,296	\$	104,814
n	2,791	1,447,659	\$	19,872		94,286	\$	114,210
ec	2,676	1,160,008	\$	19,053		75,551	\$	94,656
ov	2,727	1,198,556	\$	19,416		78,062	\$	97,530
ct	2,832	1,408,091	\$	20,164		91,709	\$	111,925
ep	3,221	1,527,936	\$	22,934		99,514	\$	122,500
Jg	3,230	1,826,638	\$	22,998		118,969	\$	142,018
ıl	3,211	1,802,953	\$	22,862		117,426	\$_	_ 140,341
	35,240	17,684,100					\$	1,403,296

FARMERS RECC CASE NO. 2014-00155

RESPONSE TO COMMISSIONS STAFF'S THIRD DATA REQUEST

ropo	sed Base Rate:	5			Member 1				
	Large Powe	r C-3		Re	tail	Who	olesale		
	Customer C	harge		\$	2,737.00				
	Demand Ch	arge per kW	•	\$	7.17	\$	7.17		
	Energy Char	•		\$	0.054382	\$	0.042882		
	<u>kW</u>	<u>kWh</u>	<u>kW \$\$</u>		Energy \$\$		<u>Total</u>		
	KVV	KVVII	KVV JJ		1321750		Total		
	3,110	1,611,184	22,299		87,619		112,655		
У	3,110	1,543,306	22,299		83,928		108,964		
r	3,110	1,468,409	22,299		79,855		104,891		
r	3,110	1,379,738	22,299		75,033		100,069		
)	3,110	1,309,622	22,299		71,220		96,256		
1	3,110	1,447,659	22,299		78,727		103,762		
3	3,110	1,321,750	22,299		71,879		96,915		
V	3,110	1,321,750	22,299		71,879		96,915		
t	3,110	1,408,091	22,299		76,575		101,611		
p	3,221	1,527,936	23,095		83,092		108,924		
g	3,230	1,826,638	23,159		99,336		125,232		
	3,230	1,802,953	23,159		98,048		123,944		
			270,101		977,192	\$	1,280,137		

FARMERS RECC CASE NO. 2014-00155

RESPONSE TO COMMISSIONS STAFF'S THIRD DATA REQUEST

Propo	sed Base Rates	;	_			Me	ember 1	
	Large Power	B-3		Ret	 ail	Wł	nolesale	
	Customer Ch	arge		\$	2,737.00		ĺ	
		nand Charge p		\$	7.17	\$	7.17	
	1	nd Charge per kW		\$	9.98	•	9.98	
	Energy Charg	- ·		\$	0.054382	\$	0.042882	,
	Contract kW	Excess kW	<u>kWh</u>		<u>kW_\$\$</u>		<u>kWh \$\$</u>	<u>Total</u>
Jun	2700	410	1,611,184		23,451		87,619	113,807
May	2700	352	1,543,306		22,872		83,928	109,537
Apr	2700	214	1,468,409		21,495		79,855	104,087
Mar	2700	42	1,379,738		19,776		75,033	97,546
Feb	2700	34	1,309,622		19,698		71,220	93,655
Jan	2700	91	1,447,659		20,267		78,727	101,731
Dec	2700	-24	1,160,008	•	19,119		63,084	84,940
Nov	2700	27	1,198,556		19,628		65,180	87,545
Oct	2700	132	1,408,091		20,676		76,575	99,988
Sep	2700	521	1,527,936		24,559		83,092	110,388
Aug	2700	530	1,826,638		24,648		99,336	126,722
Jul	2700	511	1,802,953		24,459		98,048	125,244
		`	•		260,649		961,697	1,255,190

Request 3:

Refer to Farmers' response to Item 9 of Staff's Second Request. Given the statement that the second industrial customer has such a small load factor that it would incur a penalty by switching to the proposed tariff, state whether this customer is realistically expected to do so.

Response 3:

The second industrial customer is a metal scrap recycling and processing concern. Their business is located adjacent to residential development. They currently operate their facility approximately twelve hours per day, during daylight hours. They have a desire and capability of moving to a twenty-four hour operation, but due to the location of their facilities near residential development, they have received complaints of noise. They have been reluctant to proceed with extended operational hours into the evening and overnight due to their desire to maintain good relations with their neighbors. If they were to extend their hours of operation, their load factor would improve, probably to the point that they would be able to take advantage of one of the new proposed tariffs.

Request 4:

Refer to Farmers' response to Item 9 of Staff's Second Request, Exhibit B, page 1 of 1.

Request 4a:

Refer to the "E-Rate Proposed" table at the upper left side of the page. Provide the origin of the \$7.12 kW, \$.05163 per kWh, and \$1,142.46 customer charge rates and indicate the location of these rates in the application.

Response 4a:

Due to a misinterpretation of request #9 in the second information request from the PSC a recalculated spreadsheet for one of the two industrial companies is being submitted.

Current Mid Optional Tin				No L.F. penalty		
			kW	kWh	Customer Charge	
Use Month	kW	kWh	\$7.12	\$0.06513	\$51.93	Total
Jul-12	363	320400	\$2,584.56	\$20,867.65	\$51.93	\$23,504.14
Aug-12	262.2	414600	\$1,866.86	\$27,002.90	\$51.93	\$28,921.69
Sep-12	2280.6	349200	\$16,237.87	\$22,743.40	\$51.93	\$39,033.20
Oct-12	2369.4	349200	\$16,870.13	\$22,743.40	\$51.93	\$39,665.45
Nov-12	2343.6	378000	\$16,686.43	\$24,619.14	\$51.93	\$41,357.50
Dec-12	2410.8	443400	\$17,164.90	\$28,878.64	\$51.93	\$46,095.47
Jan-13	2377.2	355800	\$16,925.66	\$23,173.25	\$51.93	\$40,150.85
Feb-13	2341.8	397200	\$16,673.62	\$25,869.64	\$51.93	\$42,595.18
Mar-13	2371.8	415800	\$16,887.22	\$27,081.05	\$51.93	\$44,020.20
Apr-13	2261.4	332400	\$16,101.17	\$21,649.21	\$51.93	\$37,802.31
May-13	2281.8	405000	\$16,246.42	\$26,377.65	\$51.93	\$42,676.00
Jun-13	2242.8	510000	\$15,968.74	\$33,216.30	\$51.93	\$49,236.97
			\$170,213.57	\$304,222.23	\$623.16	\$475,058.96

Response 4a (continued):

Proposed Mid-State			L.F. penalty included			
Proposed Rat	te-LPC-2-L	arge		****	Customer	
<u>Power</u>			kW	kWh	Charge	
Use Month	kW	kWh	\$7.17	\$0.05582	\$1,088.00	Total
Jul-12	2280.6	320400	\$16,351.90	\$54,103.81	\$1,088.00	\$71,543.72
Aug-12	2280.6	414600	\$16,351.90	\$54,103.81	\$1,088.00	\$71,543.72
Sep-12	2280.6	349200	\$16,351.90	\$54,103.81	\$1,088.00	\$71,543.72
Oct-12	2369.4	349200	\$16,988.60	\$56,210.46	\$1,088.00	\$74,287.06
Nov-12	2369.4	378000	\$16,988.60	\$56,210.46	\$1,088.00	\$74,287.06
Dec-12	2410.8	443400	\$17,285.44	\$57,192.61	\$1,088.00	\$75,566.05
Jan-13	2410.8	355800	\$17,285.44	\$57,192.61	\$1,088.00	\$75,566.05
Feb-13	2410.8	397200	\$17,285.44	\$57,192.61	\$1,088.00	\$75,566.05
Mar-13	2410.8	415800	\$17,285.44	\$57,192.61	\$1,088.00	\$75,566.05
Apr-13	2410.8	332400	\$17,285.44	\$57,192.61	\$1,088.00	\$75,566.05
May-13	2410.8	405000	\$17,285.44	\$57,192.61	\$1,088.00	\$75,566.05
Jun-13	2410.8	510000	\$17,285.44	\$57,192.61	\$1,088.00	\$75,566.05
			\$204,030.95	\$675,080.66	\$13,056.00	\$892,167.61

Request 4b:

Explain how the dollar amounts in the "E-Rate Proposed" kWh column were calculated.

Response 4b:

See Response 4a.

Request 4c:

Refer to the C-Rate table at the lower left side of the page. Explain how the dollar amounts in the kW column were calculated for Jul-12, Dec-12, Jan-13, Mar-13, and Jun-13. "

Response 4c:

See Response 4a.

Request 4 (continued):

Request 4d:

Explain the notation that the exhibit does not include a monthly facility charge \$1,695 which expires in January 2019. Include in the response supporting documentation for the January 2019 expiration date.

Response 4d:

Farmers RECC and Mid-State Recycling entered into a special facilities rider in January 2009. The agreement outlines Farmers RECC's cost to provide certain mutually agreed upon facilities specific to the consumer's service requirements, including Farmers RECC's purchase of two 1,500 kVa, 575 volt specialty transformer that are located on the consumer's facilities.